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December 15, 2021

VIA CM/ECF

Hon. P. Kevin Castel U.S. District Court for the Southern District of New York Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, NY 10007

Re: Red Tree Investments, LLC v. Petróleos de Venezuela, S.A. et al.,

Nos. 19 Civ. 2519 and 19 Civ. 2523 (S.D.N.Y.)

Dear Judge Castel:

We represent Red Tree. In advance of the conference scheduled for tomorrow morning, we have prepared a brief chronology of this case's procedural history to be of assistance to the Court. A copy of that chronology is enclosed with this letter as Exhibit A. We look forward to discussing these issues in more detail.

Respectfully submitted,

/s/ Steven F. Molo Steven F. Molo

CC: All counsel of record via CM/ECF